



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 7
901 NORTH 5TH STREET
KANSAS CITY, KANSAS 66101

SEP 29 2011

Kate Randall, Project Manager
National Park Service
Denver Service Center – Planning
PO Box 25287
Denver, CO 80225

Dear Ms. Randall:

RE: Review of Draft Environmental Impact Statement for Effigy Mounds National Monument, General Management Plan, Implementation, Clayton and Allamakee Counties, IA

The U.S. Environmental Protection Agency has reviewed the Draft Environmental Impact Statement for the Effigy Mounds National Monument GMP. Our review is provided pursuant to the National Environmental Policy Act 42 U.S.C. 4231, Council on Environmental Quality regulations 40 C.F.R. Parts 1500-1508, and Section 309 of the Clean Air Act. The DEIS was assigned the CEQ number 20110281.

The GMP/DEIS discusses and analyzes the environmental impacts of the no-action alternative and two action alternatives. The preferred alternative, "Alternative B," delivers general information about how the park intends to operate in the future with emphasis placed on protecting its cultural resources and making those resources available to research groups and visitors with minor, short-term adverse impacts and beneficial cumulative impacts.

Based on the level of impacts analyzed and conveyed in the DEIS the EPA has rated the DEIS for this project "LO" or Lack of Objections. A copy of EPA's rating descriptions is provided as an enclosure to this letter (enclosure 1).

The National Park Service may wish to tier future NEPA documents from this DEIS and to enable that potential future utilization, EPA offers a few observations and recommendations as follows:

1. North Unit: Water Treatment Facility: (on page 150, Chapter 4: Environmental Consequences under *Construction Activities*). There is only one mention in the DEIS of this facility with no explanation to its purpose. We recommend removing this project from the DEIS and submitting a separate EIS or EA for the public to review.
2. Heritage Unit:
 - a. Proposed Parking Lot on CR 76: We recommend performing an EA before implementing any construction. This will ensure proper considerations are given to water quality



impacts, considering its proximity to the wetlands and the Yellow River. The Yellow River is listed as an impaired stream according to the IDNR (see enclosure 2).

- b. Dousman Creek: Coordinate with the NRCS and state farm agencies to ensure "Prime or Unique Farmland" and "Farmland of Statewide Importance" has been dealt with appropriately. Using Web Soil Survey, a tool sanctioned by the USDA, the EPA has determined a significant portion of the area was designated Unique or Prime. The data gathered and used in the DEIS is from the NASIS list of 2005 and may be outdated. However, much of this land also falls within flood plains designated by FEMA thus may need to be reevaluated by the Iowa State Soil Scientist (see enclosure 3).

3. Sny McGill Unit:

- a. Develop a separate EA for the proposed Contact Center.
- b. Coordinate with the Iowa State Soil Scientist at NRCS to determine whether or not the "Prime Farmland" located in the proposed Contact Center construction site is indeed "Prime." Consider publishing this exchange of information in the appendix (see enclosure 4).

Thank you for the opportunity to provide comments regarding this project and your DEIS. If you have any questions or concerns, please contact Joe Summerlin at (913) 551-7029.

Sincerely,



Ronald F. Hammerschmidt, Ph.D.
Director
Environmental Services Division

4 Enclosures

Draft Environmental Impact Statement Rating Definitions

Environmental Impact of the Action

"LO" (Lack of Objections)

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

"EC" (Environmental Concerns)

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

"EO" (Environmental Objections)

The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

"EU" (Environmentally Unsatisfactory)

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the CEQ.

Adequacy of the Impact Statement

"Category 1" (Adequate)

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

"Category 2" (Insufficient Information)

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

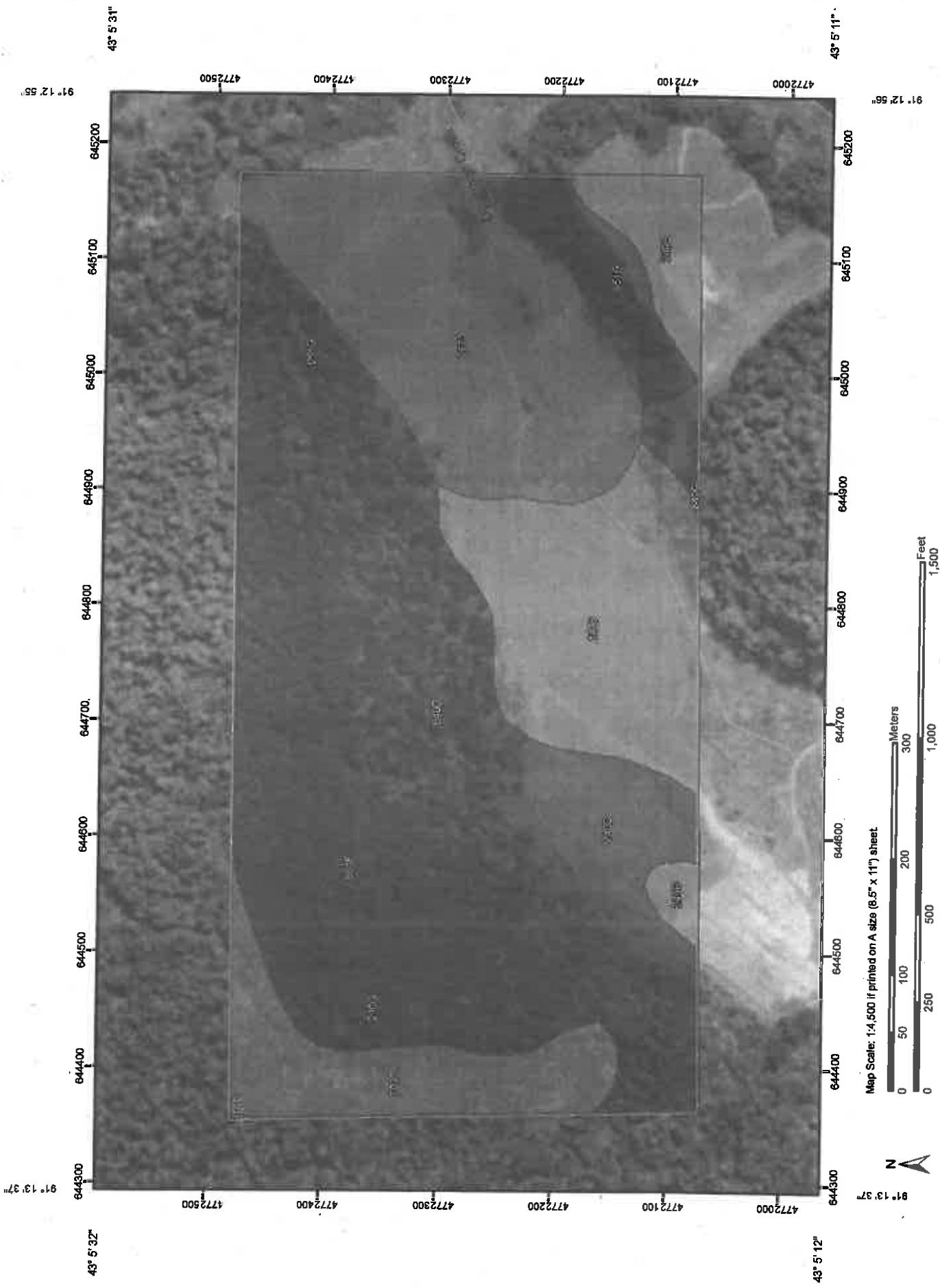
"Category 3" (Inadequate)

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

2010 IR Cat	New listing?	ADB Code	Waterbody Name	Location Description	Des. Use Impaired	Cause of 303(d) listing	Rationale for 303(d) listing	Data Source	TMDL Priority
5b	N	<u>IA 01-YEL-0010_2</u>	Miners Creek	from Hwy 52 bridge (SE 1/4 S20 T92N R2W Clayton Co.) to west line of S1 T92N R3W Clayton Co.	aquatic life	biological: unknown impact on fish / aquatic macro-invertebrates	low biotic index	IDNR/UHL biological (biocriteria) sampling in 2001.	High
5b	Y	<u>IA 01-YEL-0020_2</u>	Buck Creek	from west line of S9 T93NR3W (Clayton Co.) to confluence with unnamed tributary in S32 T94N R3W Clayton Co.	aquatic life	biological: fish kill	Fish kill in 2009 caused by either pesticide spill or feelot runoff.	IDNR fish kill investigation	Low
5b	Y	<u>IA 01-YEL-0021_0</u>	Buck Creek	from confluence with unnamed tributary (T94N R03W Sec32) to headwaters (T94N R04W Sec26)	aquatic life	biological: fish kill	Fish kill in 2009 caused by either pesticide spill or feelot runoff.	IDNR fish kill investigation	Low
5p	Y	<u>IA 01-YEL-0060_0</u>	Bloody Run	mouth (Clayton Co.) to west line of S22 T95N R4W Clayton Co.	primary contact recreation	bacteria	geometric mean > WQ criterion	IDNR bacterial monitoring, 2006-08.	Low
5a	N	<u>IA 01-YEL-0070_0</u>	Yellow River	mouth (S34 T96N R3W Allamakee Co.) to County Road X-26 bridge in S24 T96N R5W Allamakee Co.	primary contact recreation	bacteria	geometric mean > WQ criterion	IDNR/UHL ambient monthly monitoring 2006-08; IDNR special monitoring, 2004.	Medium
5b-t	N	<u>IA 01-YEL-0080_1</u>	Yellow River	from County Road X-26 (S24 T96N R5W Allamakee Co.) to old Hwy 51 crossing in NE 1/4 S11 T96N R6W Allamakee Co.	aquatic life	biological: unknown impact on fish / aquatic macro-invertebrates	low biotic index	IDNR/UHL biological (REMAP) sampling in 2006.	High

Circle 3

Farmland Classification—Allamakee County, Iowa



MAP LEGEND

<input type="checkbox"/>	Area of Interest (AOI)	
<input type="checkbox"/>	Area of Interest (AOI)	
<input checked="" type="checkbox"/>	Soil Map Units	
<input checked="" type="checkbox"/>	Soil Ratings	
<input checked="" type="checkbox"/>	Not prime farmland	
<input type="checkbox"/>	All areas are prime farmland	
<input type="checkbox"/>	Prime farmland if drained	
<input type="checkbox"/>	Prime farmland if protected from flooding or not frequently flooded during the growing season	
<input type="checkbox"/>	Prime farmland if irrigated and either protected from flooding or not frequently flooded during the growing season	
<input type="checkbox"/>	Prime farmland if irrigated and drained	
<input type="checkbox"/>	Prime farmland if irrigated and either protected from flooding or not frequently flooded during the growing season	
		Prime farmland if irrigated and removing the root inhibiting soil layer
		Prime farmland if irrigated and the product of I (soil erodibility) x C (climate factor) does not exceed 60
		Prime farmland if irrigated and reclaimed of excess salts and sodium
		Farmland of statewide importance
		Farmland of local importance
		Farmland of unique importance
		Not rated or not available
		Political Features
		Cities
		Federal Land
		National Park Service
		Water Features
		Streams and Canals
		Transportation
		Rails
		Interstate Highways
		US Routes
		Major Roads
		Local Roads

MAP INFORMATION

Map Scale: 1:4,500 if printed on A size (8.5" x 11") sheet.

The soil surveys that comprise your AOI were mapped at 1:15,840.

Warning: Soil Map may not be valid at this scale.

Enlargement of maps beyond the scale of mapping can cause misunderstanding of the detail of mapping and accuracy of soil line placement. The maps do not show the small areas of contrasting soils that could have been shown at a more detailed scale.

Please rely on the bar scale on each map sheet for accurate map measurements.

Source of Map: Natural Resources Conservation Service
Web Soil Survey URL: <http://websoilsurvey.nrcs.usda.gov>

Coordinate System: UTM Zone 15N NAD83

This product is generated from the USDA-NRCS certified data as of the version date(s) listed below:

Soil Survey Area: Allamakee County, Iowa
Survey Area Data: Version 14, Mar 10, 2009

Date(s) aerial images were photographed: 7/8/2006

The orthophoto or other base map on which the soil lines were compiled and digitized probably differs from the background imagery displayed on these maps. As a result, some minor shifting of map unit boundaries may be evident.

Farmland Classification

Farmland Classification—Summary by Map Unit — Allamakee County, Iowa (IA005)				
Map unit symbol	Map unit name	Rating	Acres in AOI	Percent of AOI
163E	Fayette silt loam, 14 to 18 percent slopes	Farmland of statewide importance	0.1	0.1%
210G	Boone loamy sand, 25 to 40 percent slopes	Not prime farmland	6.4	7.9%
249C	Zwingle silt loam, 1 to 9 percent slopes	Farmland of statewide importance	3.0	3.7%
703D	Dubuque silt loam, 9 to 14 percent slopes	Farmland of statewide importance	6.0	7.4%
740G	Hawick gravelly sand, 18 to 40 percent slopes	Not prime farmland	3.7	4.6%
840G	Lacrescent silt loam, 25 to 70 percent slopes	Not prime farmland	22.4	27.5%
861F	Yellowriver silt loam, 18 to 25 percent slopes	Not prime farmland	6.6	8.1%
951G	Medary silt loam, 14 to 45 percent slopes	Not prime farmland	6.6	8.1%
1496	Arenzville-Volney complex, 0 to 2 percent slopes	Farmland of statewide importance	11.1	13.6%
2670	Ion silt loam, 0 to 2 percent slopes	All areas are prime farmland	15.6	19.1%
Totals for Area of Interest			81.5	100.0%

Description

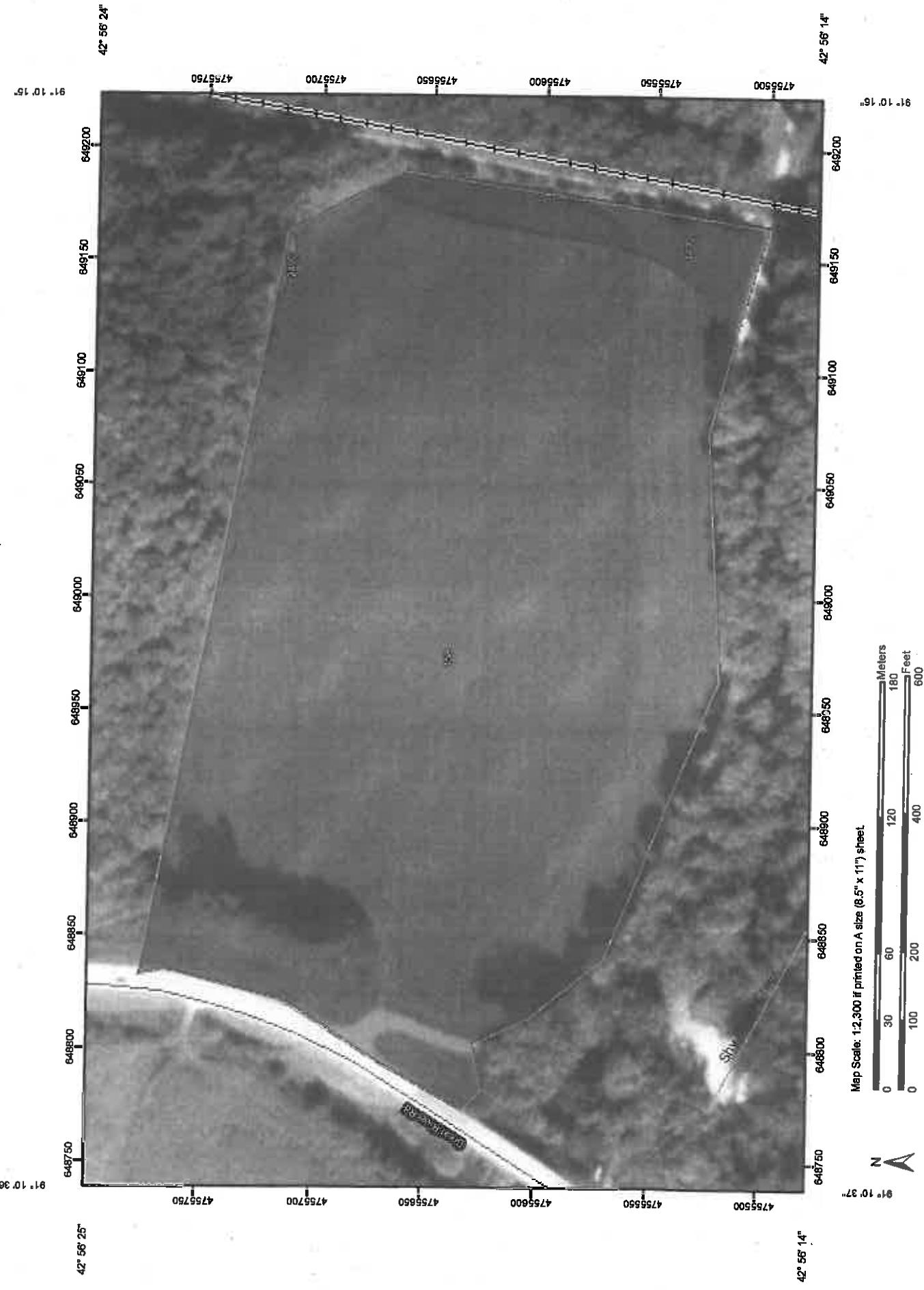
Farmland classification identifies map units as prime farmland, farmland of statewide importance, farmland of local importance, or unique farmland. It identifies the location and extent of the soils that are best suited to food, feed, fiber, forage, and oilseed crops. NRCS policy and procedures on prime and unique farmlands are published in the "Federal Register," Vol. 43, No. 21, January 31, 1978.

Rating Options

Aggregation Method: No Aggregation Necessary

Tie-break Rule: Lower

Farmland Classification—Clayton County, Iowa
(Sny McGill Contact Center)



MAP LEGEND

Area of Interest (AOI)	<input type="checkbox"/>	Area of Interest (AOI)	
Soils			
Soil Map Units			
Soil Ratings			
Not prime farmland	<input type="checkbox"/>	Prime farmland if subsoiled, completely removing the root inhibiting soil layer	Interstate Highways
All areas are prime farmland	<input type="checkbox"/>	Prime farmland if irrigated and the product of f (soil erodibility) x C (climate factor) does not exceed 60	US Routes
Prime farmland if drained	<input type="checkbox"/>	Prime farmland if irrigated and reclaimed of excess salts and sodium	Major Roads
Prime farmland if protected from flooding or not frequently flooded during the growing season	<input type="checkbox"/>	Farmland of statewide importance	Local Roads
Prime farmland if irrigated and either protected from flooding or not frequently flooded during the growing season	<input type="checkbox"/>	Farmland of local importance	
Prime farmland if irrigated and drained	<input type="checkbox"/>	Farmland of unique importance	
Prime farmland if irrigated and either protected from flooding or not frequently flooded during the growing season	<input type="checkbox"/>	Not rated or not available	
		Political Features	
		Cities	
		Federal Land	
		National Park Service	
		Water Features	
		Streams and Canals	
		Transportation	
		Rails	
		+++	

MAP INFORMATION

Map Scale: 1:2,300 if printed on A size (8.5" x 11") sheet.

The soil surveys that comprise your AOI were mapped at 1:15,840.

Warning: Soil Map may not be valid at this scale.

Enlargement of maps beyond the scale of mapping can cause misunderstanding of the detail of mapping and accuracy of soil line placement. The maps do not show the small areas of contrasting soils that could have been shown at a more detailed scale.

Please rely on the bar scale on each map sheet for accurate map measurements.

Source of Map: Natural Resources Conservation Service
Web Soil Survey URL: <http://websoilsurvey.nrcs.usda.gov>

Coordinate System: UTM Zone 15N NAD83

This product is generated from the USDA-NRCS certified data as of the version date(s) listed below.

Soil Survey Area: Clayton County, Iowa
Survey Area Data: Version 15, Jul 8, 2009

Date(s) aerial images were photographed: 9/14/2006

The orthophoto or other base map on which the soil lines were compiled and digitized probably differs from the background imagery displayed on these maps. As a result, some minor shifting of map unit boundaries may be evident.

Farmland Classification

Farmland Classification—Summary by Map Unit — Clayton County, Iowa (IA043)				
Map unit symbol	Map unit name	Rating	Acres in AOI	Percent of AOI
158	Dorchester silt loam, 0 to 2 percent slopes	All areas are prime farmland	18.5	94.9%
249C	Zwingle silt loam, 2 to 9 percent slopes	Farmland of statewide importance	0.0	0.2%
1490	Caneek silt loam, channeled, 0 to 2 percent slopes	Not prime farmland	1.0	4.9%
Totals for Area of Interest			19.4	100.0%

Description

Farmland classification identifies map units as prime farmland, farmland of statewide importance, farmland of local importance, or unique farmland. It identifies the location and extent of the soils that are best suited to food, feed, fiber, forage, and oilseed crops. NRCS policy and procedures on prime and unique farmlands are published in the "Federal Register," Vol. 43, No. 21, January 31, 1978.

Rating Options

Aggregation Method: No Aggregation Necessary

Tie-break Rule: Lower

